

United States Bankruptcy Court  
Eastern District of Texas  
Sherman Division

**In re:**

**Empire Countertops, LLC**  
1137 Enterprise Dr.  
Pilot Point, TX 76258  
EIN: 45-1145076

**Case No. 22-41686-btr**

**Chapter 11**

**Debtor(s)**

**Empire Countertops, LLC,**  
Plaintiff

**v.**

**Adversary No. 22-04066**

**JPMorgan Chase & Co., Eagle Eye  
Advance LLC, Block Inc. fka Square Inc.,  
and Last Chance Funding, Inc.**  
Defendants

**Hearing Scheduled:  
Wednesday, December 28, 2022 at  
10:00a.m.**

**EXHIBIT LIST OF EMPIRE COUNTERTOPS, LLC**

<b>Exhibit</b>	<b>Description of Exhibit</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>
1.	Order Granting Plaintiff's Preliminary Injunction			
2.	Facsimile Receipts to JPMorgan Chase Bank			
3.	December 22, 2022 Audio Recording			
4.	Any item filed of record in this proceeding			
5.	Any exhibit introduced by any other party			

**WITNESS LIST**

1. Curtis "Mitch" Mahoney, Debtor's Representative
2. Scott Laine, Debtor's Controller
3. Clayton L. Everett, Plaintiff's Attorney

4. Any witness called or listed on opposing counsel's list.

The Debtor reserves the right to use any exhibit introduced into evidence by any other party, to introduce and use any document that has been filed in this bankruptcy proceeding, to use any witness or exhibit not listed herein for purposes of rebuttal or impeachment, and to supplement or amend this witness and exhibit list at any time prior to the hearing.

DATED: December 22, 2022.

Respectfully submitted:

NORRED LAW, PLLC

By:   /s/ Clayton L. Everett    
Clayton L. Everett  
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515 E. Border Street  
Arlington, Texas 76010  
Telephone: (817) 704-3984  
Proposed Counsel for Debtor

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the Plaintiff's Witness Exhibit List was served on the Office of the U.S. Trustee and upon the parties receiving notice via the Court's CM/ECF system. A copy was also mailed to the parties below:

The LCF Group, Inc.  
3000 Marcus Ave. Suite 2W15  
New Hyde Park, NY 11042

Eagle Eye Advance LLC  
254 36<sup>th</sup> Street, Ste. C303  
Brooklyn, NY 11232

Block Inc. fka Square Inc.  
c/o C T Corporation  
1999 Bryan St., Ste. 900  
Dallas, TX 75201-3136

Jeremy S. Williams  
901 East Byrd Street, Suite 1000  
Richmond, Virginia 23219  
Via: [jeremy.williams@kutakrock.com](mailto:jeremy.williams@kutakrock.com)  
Counsel for Eagle Eye Advance LLC

JPMorgan Chase & Co.  
c/o C T Corporation  
1999 Bryan St., Ste. 900  
Dallas, TX 75201-3136  
And Via Fax: 225-341-3302

By:   /s/ Clayton L. Everett